

FILED

AO 91 (Rev. 11/11) Criminal Complaint

AUSA Angel M. Krul (312) 399-9915

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SEP 03 2020

MAGISTRATE JUDGE MARIA VALDEZ
UNITED STATES DISTRICT COURT

UNITED STATES OF AMERICA

v.

CASE NUMBER:

20 CR 585

JACOB MATHLEY

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about September 2, 2020, at Aurora, in the Northern District of Illinois, Eastern Division, the defendant violated:

Code Section

Title 18, United States Code, Section
2252A(a)(5)(B)

Offense Description

did knowingly possess material, namely, an ASUS laptop notebook, model X540S, bearing serial number G9N0CX18X15038D, that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), involving a prepubescent minor and a minor who had not attained 12 years of age, such image having been shipped and transported using any means or facility of interstate foreign commerce and in or affecting interstate commerce by any means, including by computer, and such images having been produced using materials that had been shipped and transported in and affecting interstate and foreign commerce by any means

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

/s/ Susan Jensen

SUSAN JENSEN

Special Agent, Homeland Security Investigations
(HSI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: September 3, 2020

Maria Valdez
Judge's signature

City and state: Chicago, Illinois

MARIA VALDEZ, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, SUSAN JENSEN, being duly sworn, state as follows:

1. I am a Special Agent with the Homeland Security Investigations (HSI), and have been so employed since 2006. My current responsibilities include the investigation of child exploitation and child pornography.

2. This affidavit is submitted in support of a criminal complaint alleging that Jacob MATHLEY has violated Title 18, United States Code, Section 2252A(a)(5)(B). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging MATHLEY with possession of child pornography, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, and on information obtained during a post-arrest interview of MATHLEY.

I. FACTS SUPPORTING PROBABLE CAUSE

4. On August 28, 2020, the Honorable Sheila E. Finnegan issued a search warrant to search the residence located at 2450 Biltmore Circle in Aurora, Illinois,

for evidence, instrumentalities, and contraband related to possession, distribution, receipt, and advertisement of child pornography.

5. On September 2, 2020, HSI agents executed that search warrant. MATHLEY was home at the time of the search.

6. After being read his *Miranda* warnings, MATHLEY agreed to speak with law enforcement. The interview was audio-recorded. During the interview, MATHLEY admitted to possessing, downloading, and distributing child pornography on the internet. He admitted that just prior to law enforcement arriving at his house, he was online and accessing Website 1 and Website 2 on the darkweb.¹ He stated that the laptop he had been using prior to the agents' arrival was outside the basement window. He stated that agents would find child pornography on the laptop. He further stated that he collects and posts links to images of girls as young as 8 years old. MATHLEY told agents his username on Website 1 and 2 and stated that he had had it for a year and a half. MATHLEY admitted he "should not have been doing this." MATHLEY stated he had been interested in child pornography for about a year and a half.

¹ The dark web is comprised of a variety of networks, such as TOR ("The Onion Router"), that exist on a portion of the internet accessible only through specific software, such as the TOR browser (a legal and publicly available free application). One of the key features of dark web networks like TOR is the anonymity it offers both users of the network and individuals or entities that host sites on the network, which are also referred to as hidden services. Website 1 and Website 2 are TOR hidden services dedicated to the sexual exploitation of children. The true names of Website 1 and Website 2 are known to law enforcement but redacted in this affidavit to protect the integrity of the ongoing investigation.

7. During the search, HSI agents located numerous electronic devices, including an ASUS laptop notebook, model X540S, bearing serial number G9N0CX18X15038D. Agents located this laptop outside the basement window where MATHLEY stated it would be. Computer forensic agents observed that the laptop was powered up and running with Website 1 open on the screen.

8. A forensic examiner conducted a preliminary on-site review of the contents of the ASUS laptop and determined that it contained numerous files of child pornography, including the following examples:

a. An image with the file name of "image.php.jpg," which depicts a prepubescent girl, approximately 10-years old, lying naked on a bed with her legs spread open. The focus of the image is on the girl's vagina

b. An image with the file name of "joiuihuih.jpg," which depicts a pubescent girl, approximately 11-years old, lying on a bed with her legs spread apart. The girl is using her hands to spread her vagina and anus, which is the focus of the image.

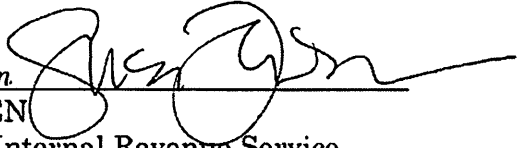
c. An image with the file name "IJgIVQRv.jpg," which depicts a prepubescent girl, approximately 10-years old, lying on bed with her hands spreading her vagina open. The focus of the image on the girl's vagina.

9. HSI agents have examined the ASUS laptop computer described above and determined that it is manufactured in China.

II. CONCLUSION

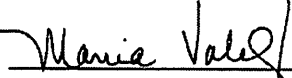
10. Based on the foregoing facts, I respectfully submit that there is probable cause to believe that on or about September 2, 2020, MATHLEY knowingly possessed material, namely, an ASUS laptop notebook, model X540S, bearing serial number G9N0CX18X15038D, that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that involved a prepubescent minor and a minor who had not attained 12 year of age, such image having been shipped and transported using any means or facility of interstate or foreign commerce, and such image having been produced using materials that have been shipped and transported in and affecting interstate and foreign commerce by any means, in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

FURTHER AFFIANT SAYETH NOT.


/s/ Susan Jensen.

SUSAN JENSEN
Special Agent, Internal Revenue Service

SWORN TO AND AFFIRMED by telephone September 3, 2020.



Honorable MARIA VALDEZ
United States Magistrate Judge